

To: DiBiasio, Karen@DTSC[Karen.DiBiasio@dtsc.ca.gov]; Conlan, Linda (linda.conlan@amecfw.com)[linda.conlan@amecfw.com]; Dadap, Nathan C.[DADAP.NATHAN@EPA.GOV]
Cc: Endlich, Brian@DTSC[Brian.Endlich@dtsc.ca.gov]; Taylor, Debra@DTSC[Debra.Taylor@dtsc.ca.gov]; Brown, Christine@DTSC[Christine.Brown@dtsc.ca.gov]; Garbaccio, Bruce@DTSC[Bruce.Garbaccio@dtsc.ca.gov]; Gerald Pepper (gerald.pepper@gmail.com)[gerald.pepper@gmail.com]
From: Sultana, Chand@DTSC
Sent: Tue 4/26/2016 3:25:19 AM
Subject: RE: Pechiney Final Phase II RACR - HERO's review

Karen,

Thanks for your comments. It indicates that you still have concerns/comments about soil sampling locations, adequacy of the analytical methods and meeting remedial goals even after few rounds of commenting/revisions. You have provided the “conclusion” but not the “recommendations” about approval of the Report. At this point, shall we approve or ask for further explanations/revisions to address your comments/concerns? Please confirm.

EPA, who was the lead agency for PCB review for this project, already had issued an approval letter and also provided the info you had requested from them but still you have copied to Nathan in this message. Is there any confirmation or anything related to PCB that we are looking from them for DTSC’s approval of this Report? Please inform.

Thanks

Hi Nathan,

Since you have reviewed the PCB-related portions of the Report, please confirm the following statements highlighted in blue.

Thanks

Linda,

Thanks for the revisions and the final Report. Please find the following comments from Karen and inform that if the highlighted concerns were discussed in your phone call discussions? I was hoping that every issue has been raised and resolved before we received the final report and there will be no more comments/concerns at this point.

Thanks

From: DiBiasio, Karen@DTSC
Sent: Monday, April 25, 2016 4:15 PM
To: Sultana, Chand@DTSC
Cc: Endlich, Brian@DTSC; Taylor, Debra@DTSC; Brown, Christine@DTSC; Garbaccio, Bruce@DTSC; Dadap, Nathan C.
Subject: Pechiney Final Phase II RACR - HERO's review

TO: Chand Sultana
Project Manager
Cleanup Program
9211 Oakdale Avenue
Chatsworth, California 91311

FROM: Karen W. DiBiasio, Ph.D.
Staff Toxicologist
Human and Ecological Risk Office (HERO)
Brownfields and Environmental Restoration Program

DATE: April 25, 2016

SUBJECT: Former Pechiney Cast Plate, Inc. – Vernon, CA

Revised Phase II Soil Remedial Action Completion Report

DOCUMENT REVIEWED

Per your April 25, 2016 request, The Human and Ecological Risk Office (HERO) reviewed the April 22, 2016 "Final Phase II Completion Report, Former Pechiney Cast Plate, Inc. Facility, 3200 Fruitland Avenue, Vernon, California" (Report) prepared by Amec Foster Wheeler in Irvine.

SCOPE OF REVIEW

HERO reviewed the document to ensure our previous comments were sufficiently addressed in the Report. HERO reviewed the document for aspects relevant to human health risk assessment to determine whether soils remaining in place meet the remedial goals (RGs) and are protective of human health for current and potential future exposures. HERO defers to DTSC Project Management staff on appropriateness of the sample locations and analyses conducted. The soil sampling and analytical methods were not included in the report; HERO assumes other DTSC staff have assessed the adequacy of the sampling and analysis methods for risk-based decision making, including that all metals used at the former facility were included in the analytical suite (for example, iron and/or tin). HERO defers to DTSC Project Management staff on appropriateness of the sample locations and analyses conducted.

CONCLUSIONS

HERO concurs with the findings in the Report. HERO concurs that the UWBs cover the majority of the PCB-impacted soil remaining above remedial goals in the areas of 4a/4b, shoring boxes north and south and concrete removal area C. HERO concurs that arsenic remains in soil under the sidewalk near the rail road tracks and on the western side of Phase IIB.

HERO acknowledges that the investigation and confirmation sampling were primarily driven by PCBs with the assumption that if PCBs were not present, then other contaminants were not present. HERO acknowledges that extents of TPH contamination were investigated based on staining and odor for the most part, rather than confirmation sampling. HERO acknowledges the soil sampling strategy for metals was limited to areas with visible soil staining if intact underground structures or pipes with contents of high metals concentrations were observed without breaches to the surrounding soil. HERO defers to DTSC Project Management staff regarding meeting RGs because analytical data are not systemically available to support the assertion that residual soil metals and TPHs concentrations are less than RGs, relying sometimes on PCBs analyses as confirmation rather than metals or TPHs.

Please contact me if I can be of further assistance.

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